

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

THE UNITED STATES OF  
AMERICA, *et al.*,

Plaintiffs,

v.

REALPAGE, INC., *et al.*,

Defendants.

Case No. 1:24-cv-00710-LCB-JLW

**JOINT MOTION OF PLAINTIFF STATES  
AND GREYSTAR MANAGEMENT SERVICES,  
LLC FOR ENTRY OF CONSENT JUDGMENT  
AND DISMISSAL WITH PREJUDICE**

Plaintiff States of California, Colorado, Connecticut, Illinois, Minnesota, North Carolina, Oregon, and Tennessee, and the Commonwealth of Massachusetts, acting by and through their respective Attorneys General (collectively, the "Plaintiff States") and Greystar Management Services, LLC ("Greystar") have negotiated and agreed to resolve all issues in this matter in accordance with the terms of the Consent Judgment and Dismissal with Prejudice attached hereto as Exhibit A.

Greystar's Consent Judgment with the Plaintiff States resolves all claims against Greystar in this case because Greystar previously reached resolution with Plaintiff the United States of America through a Proposed Final Judgment filed with the Court on August 8, 2025. (ECF. Nos. 152, 152-1.) The Court entered the

settlement stipulation between the United States and Greystar on August 18, 2025. (ECF No. 154.)

Dated: November 18, 2025

/s/ Kunal J. Choksi

Kunal J. Choksi  
Senior Deputy Attorney General  
N.C. Bar. No. 55666  
ASA C. EDWARDS IV  
Special Deputy Attorney General  
N.C. Bar  
No. 46000  
North Carolina Department of  
Justice  
114 W. Edenton St.  
Raleigh, NC 27603  
(919) 716-6000 | [kchoksi@ncdoj.gov](mailto:kchoksi@ncdoj.gov)

*Attorneys for Plaintiff State of  
North Carolina*

/s/ James P. McLoughlin

James P. McLoughlin  
N.C. Bar No. 13795  
Moore & Van Allen PLLC  
100 North Tryon Street  
Charlotte, NC 28202  
Phone: (704) 331-1000  
Fax: (704) 331-1159  
[mcloughlinj@mvalaw.com](mailto:mcloughlinj@mvalaw.com)

/s/ Karen Hoffman Lent

Karen Hoffman Lent  
(LR 83.1(d) Counsel)  
Boris Bershteyn  
(LR 83.1(d) Counsel)  
Evan Kreiner  
(LR 83.1(d) Counsel)  
Sam Auld  
(LR 83.1(d) Counsel)

SKADDEN, ARPS,  
SLATE, MEAGHER & FLOM LLP  
One Manhattan West  
New York, NY 10001  
Phone: (212) 735-3000  
Fax: (212) 735-2000  
[karen.lent@skadden.com](mailto:karen.lent@skadden.com)  
[boris.bershteyn@skadden.com](mailto:boris.bershteyn@skadden.com)  
[evan.kreiner@skadden.com](mailto:evan.kreiner@skadden.com)  
[sam.auld@skadden.com](mailto:sam.auld@skadden.com)

*Counsel for Defendant  
Greystar Management  
Services, LLC*

/s/ Pamela Pham

DOAN-PHUONG (PAMELA) PHAM  
QUYEN TOLAND  
Deputy Attorneys General  
Office of the Attorney General  
California Department of Justice  
300 South Spring Street, Suite  
1702  
Los Angeles, CA 90013  
(213) 269-6000 |  
[Pamela.Pham@doj.ca.gov](mailto:Pamela.Pham@doj.ca.gov)

*Attorneys for Plaintiff State of  
California*

s/ Julián A. Quiñones Reyes

Julián A. Quiñones Reyes  
Assistant Attorney General  
Office of the Connecticut Attorney  
General  
165 Capitol Avenue  
Hartford, CT 06106  
(860) 808-5030 |  
[julian.quinones@ct.gov](mailto:julian.quinones@ct.gov)

*Attorney for Plaintiff State of  
Connecticut*

/s/ Elizabeth W. Hereford

Elizabeth. W. Hereford  
Assistant Attorney General  
Bryn A. Williams  
First Assistant Attorney  
General  
Colorado Department of Law  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Telephone: (720) 508-6000  
Email:  
[Elizabeth.Hereford@coag.gov](mailto:Elizabeth.Hereford@coag.gov)

*Attorney for the Plaintiff  
State of Colorado*

/s/ Katherine W. Krems

KATHERINE W. KREMS  
Assistant Attorney General  
JENNIFER E. GREANEY  
Deputy Chief  
Office of the Massachusetts  
Attorney General  
One Ashburton Place  
18<sup>th</sup> Floor  
Boston, Massachusetts 02108  
(617) 963-2189  
[Katherine.Krems@mass.gov](mailto:Katherine.Krems@mass.gov)  
[Jennifer.Greaney@mass.gov](mailto:Jennifer.Greaney@mass.gov)

*Attorneys for Plaintiff  
Commonwealth of  
Massachusetts*

/s/ Daniel R. Betancourt

DANIEL BETANCOURT, Assistant  
Attorney General  
JENNIFER M. CORONEL, Assistant  
Attorney General  
PAUL J. HARPER, Assistant Attorney  
General  
Office of the Illinois Attorney  
General  
115 S. LaSalle St., Floor 23  
Chicago, IL 60603  
Tel: (312) 415-7945  
[Daniel.betancourt@ilag.gov](mailto:Daniel.betancourt@ilag.gov)  
[Paul.harper@ilag.gov](mailto:Paul.harper@ilag.gov)  
[Jennifer.coronel@ilag.gov](mailto:Jennifer.coronel@ilag.gov)

*Attorneys for Plaintiff State of  
Illinois*

s/Katherine A. Moerke

KATHERINE A. MOERKE  
ELIZABETH ODETTE  
SARAH DOKTORI  
Assistant Attorneys General  
Office of the Minnesota Attorney  
General  
445 Minnesota Street, Suite 600  
St. Paul, MN 55101  
[katherine.moerke@ag.state.mn.us](mailto:katherine.moerke@ag.state.mn.us)  
Telephone: (651) 757-1288  
[elizabeth.odette@ag.state.mn.us](mailto:elizabeth.odette@ag.state.mn.us)  
Telephone: (651) 728-7208  
[sarah.doktori@ag.state.mn.us](mailto:sarah.doktori@ag.state.mn.us)  
Telephone: (651) 583-6694

*Attorneys for Plaintiff State of  
Minnesota*

/s/ Timothy D. Smith

Timothy D. Smith  
Attorney-in-Charge  
Economic Justice Section  
Oregon Department of  
Justice  
100 SW Market St,  
Portland OR 97201  
503.798.3297 |  
[tim.smith@doj.oregon.gov](mailto:tim.smith@doj.oregon.gov)

*Attorney for Plaintiff  
State of Oregon*

/s/ Daniel Lynch

Daniel Lynch  
Assistant Attorney General  
S. Ethan Bowers  
Senior Assistant Attorney  
General  
Sophie Assadnia  
Assistant Attorney General  
Consumer Protection  
Division  
Office of the Tennessee  
Attorney General  
P.O. Box 20207  
Nashville, Tennessee  
37202  
[daniel.lynch@ag.tn.gov](mailto:daniel.lynch@ag.tn.gov)  
615.532.5732  
[ethan.bowers@ag.tn.gov](mailto:ethan.bowers@ag.tn.gov)  
615.837.5582  
[sophie.assadnia@ag.tn.gov](mailto:sophie.assadnia@ag.tn.gov)  
615.532.4208

*Attorneys for Plaintiff  
State of Tennessee*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was filed electronically this the 18th day of November, 2025. Notice of this filing was served via the Court's Electronic Case Filing system to all parties and counsel listed on the electronic filing receipt. Copies may also be accessed through the Court's Electronic Case Filing system.

/s/ James P. McLoughlin  
James P. McLoughlin